



## RURAL TELEPHONE SERVICE CO., INC.

*Your One-Stop Communications, Information and Entertainment Source*

June 19, 2007

Ms. Marlene Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-B204  
Washington, D.C. 20554

**Re: In the Matter of High-Cost Universal Service Support, WC Docket No. 05-337; In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45**

Dear Ms. Dortch:

I would like to thank and praise Commissioner Deborah Taylor Tate for her outstanding leadership as chair of the Federal-State Joint Board on Universal Service (Joint Board) and for her eloquent testimony before the Senate Commerce Committee on June 12, 2007. I also would like to express my full support of the Joint Board's recommendation to place an interim, emergency cap on the amount of high-cost universal service support that competitive eligible telecommunications carriers (CETCs) will receive over the next 18 months. The Joint Board's proposed interim cap will secure the near-term sustainability of the high-cost Universal Service Fund (USF). This is a necessary first step toward long-term USF reform that must be taken to sustain affordable communications services for generations to come.

We are in a unique position of operating a small, rural ILEC with a wireless subsidiary that is drawing universal service support as a CETC. There are three wireless companies in western Kansas drawing USF support based on the ILEC cost. Even though our wireless subsidiary is drawing USF based on the ILEC cost, we feel strongly that the CETCs should be drawing funds based on their own cost. The identical support rule should be eliminated.

Even though our wireless subsidiary will be hurt in the interim, we feel the proposed interim measure will relieve the rapidly growing pressure on the high-cost USF mechanism resulting from the explosive growth in CETC USF support. Adopting the 18-month interim CETC USF cap will provide the Federal Communications Commission (FCC) enough time to develop and implement long-term USF reform measures without risking the sustainability of the fund or public safety.

This is the best way to begin a process to preserve universal service for the benefit of all consumers. Without this critical interim action and the leadership of Commissioner Tate the benefits that universal service provides to consumers would be in serious jeopardy in the very near future. For these reasons, I urge Chairman Martin and Commissioners Copps, Adelstein and McDowell to support Commissioner Tate and adopt the Joint Board's proposed emergency, interim cap on CETC high-cost universal service support.

Sincerely,

Larry E. Sevier  
CEO

c: Chairman Kevin J. Martin  
Commissioner Jonathan S. Adelstein  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Deborah Taylor Tate